

BLANK LAW, PC

Criminal Defense Attorney
Focused On: Sexual Assault Charges

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BY ELECTRONIC FILING

Honorable Ann M. Donnelly
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR THE DEFENDANT

Re: United States v. Robert S. Kelly, Criminal Docket No. 19-286 (S-1)(AMD)

Dear Judge Donnelly:

Attorney Nicole Blank Becker of Blank Law, PC is one of the defense attorneys of record with respect to *United States v. Robert S. Kelly*, 19-286 (S-1)(AMD). Mr. Kelly's jury trial has concluded and a verdict has been rendered in this matter on September 27, 2021. Sentencing is currently scheduled for May 4, 2022. A pre-sentence report has not been completed as of today.

Thereafter, Robert S. Kelly retained Attorney Jennifer Bonjean of the Bonjean Law Group, PLLC. Ms. Bonjean filed her Notice of Appearance on October 29, 2022. After filing her Notice of Appearance, Ms. Bonjean advised current counsel that she will be handling all post-trial motions and ultimately the appeal in this matter. I am not asserting or retaining a charging lien.

Mr. Kelly has advised me that it is his desire to have Ms. Bonjean prepare any and all post-trial motions and appeal. As a result, Mr. Kelly has consented, both orally and by way of email, to my request to withdraw.

Sincerely,

By: /s/Nicole Blank Becker
Nicole Blank Becker, Esq.
Current Counsel for Robert S. Kelly